

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CR. NO. 22-20504

v.

HON. PAUL D. BORMAN

AWS MOHAMMED NASER,

Defendant.

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RESPONSE TO GOVERNMENT'S MOTION TO STRIKE
DEFENDANT'S PRO SE MOTIONS

The government filed a motion to strike *pro se* motions filed by Aws Naser. Mr. Naser, by his attorneys James Gerometta and Amanda Bashi, requests that the motions be held in abeyance until defense counsel has obtained appropriate discovery pertinent to the motions. In support of this request, Mr. Naser offers the following:

1. On December 16, 2022, Mr. Naser filed two *pro se* motions. (ECF Nos. 20 & 21.)
2. On December 22, 2022, the government made its first discovery production.

That same day, the Court held a status conference with the parties on the record.

In addressing Mr. Naser's *pro se* motions, the Court noted that the motions tolled the speedy trial clock, and that it would give defense counsel an opportunity to consider whether to adopt the motions and/or supplement them.

3. On December 23, 2022, the government filed a motion to strike Mr. Naser's *pro se* motions. (ECF No. 26.)

4. Defense counsel does not yet have adequate discovery to determine whether to adopt or supplement Mr. Naser's *pro se* motions. While the government has made one production, it does not contain key case documents, such as the search warrants or supporting affidavits.
5. As such, Mr. Naser requests the Court hold his *pro se* motions in abeyance, until appropriate discovery productions have been made and defense counsel can make an informed decision about how to proceed.

Respectfully submitted,

FEDERAL COMMUNITY DEFENDER

s/ *Amanda Bashi*

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Dated: January 4, 2023

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2023, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the parties of record.

Signed,

s/Amanda N. Bashi

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Dated: January 4, 2023